REMARKS

No amendments to the claims are presented by the instant response. Claims 1-18, 38-55, 75, 80, 81, and 86-102 remain pending in the instant Application and are presented for the Examiner's review in light of the following comments.

Rejection Under 35 U.S.C. §103

Claims 1-11, 13-18, 38-48, 50-55, 75, 80, 81, 86-91, and 93-101 have been rejected under 35 U.S.C. §103(a) over Wilbur, U.S. Patent No. 2,338,749 in view of Reed, et al., U.S. Patent No. 4,054,697, and further in view of the admitted prior art. Previous arguments made with respect to the *Wilbur* reference remain in effect but will not be repeated for the sake of brevity. Applicants respectfully traverse this rejection and request reconsideration and withdrawal of the Examiner's 35 U.S.C. §103(a) rejection based upon the following comments:

1. As stated previously, Applicants' Claims 38 and 86 claim a storage wrap material comprising, *inter alia*, **a sheet of non-porous material** that is capable of forming a continuous seal.

2. Again, Figs. 1-6 of the *Wilbur* reference provide an adhesive within in a plurality of discontinuous pockets.

3. Therefore, Figs. 1-6 of the *Wilbur* reference provide a non-porous material that is not capable of forming a continuous seal. Applicants are at a loss to understand how a porous material is even remotely capable of forming a continuous seal.

4. Figs. 7-8 of the *Wilbur* reference provide a sheet material having holes disposed thereon wherein the holes are the resultant of pin punctures that are surrounded by a coating of adhesive.

5. Thus, Figs. 7-8 of the *Wilbur* reference provide a porous material. It is difficult to understand how a porous material would be capable of forming a continuous seal.

6. The *Reed* reference imparts a discontinuous layer of resilient non-adhesive particles onto an adhesive coated surface. (1:37-42) The resilient particles protrude from the surface of the adhesive coating so that if the working surface of the sheet material is superimposed on a support surface, such as a wall, the adhesive does not come into complete contact with the support surface even with the application of light hand pressure. (1:46-51) The sheet material is then adhered to the surface merely by applying sufficient pressure by means of a hand or a roller to deform the particles on the surface of the adhesive to such an extent as to bring the adhesive and the surface into fuller contact. (1:55-59) Additionally, it should be further noted that the *Reed* reference states, "It may be necessary to cover the discontinuous layer of resilient particles with a suitable release paper which,

when the sheet material is rolled up for storage purposes, prevents adhesion to the decorative surface of a sheet material. (2:45-49)

7. Thus, applying a discontinuous layer of resilient non-adhesive particles to the structures disclosed by the *Wilbur* reference, would provide one of two choices. The first is a sheet of non-porous material having an adhesive disposed continuously thereon and further having a plurality of deformable particles disposed thereon. It is difficult for Applicants to understand how this structure could be considered to be capable of forming a continuous seal. Alternatively, the combination of these two references can provide a porous material having an adhesive disposed continuously thereon further having deformable particles disposed thereon. Again, Applicants are at a loss to understand how such a porous structure could be considered by one of skill in the art to be capable of forming a continuous seal. In any regard, the combination of these two references does not provide a sheet of non-porous material having an adhesive disposed continuously thereon, as claimed by Applicants.

It is settled Federal Circuit case law that demands that, "When a rejection depends on a combination of prior art references, there must be some teaching, suggestion, or motivation to combine the references to provide the claimed invention." *Akamai Technologies, Inc. v. Cable & Wireless Internet Svcs., Inc.*, 344 F.3d 1186, 68 U.S.P.Q.2d 1186 (Fed. Cir. 2003) This requires that, "Some objective teaching in the prior art or that knowledge generally available to one of ordinary skill in the art would lead that individual to combine the relevant teachings of the references [to provide the claimed invention]." *See Tech Air, Inc. v. Denso Mfg. Michigan, Inc.*, 192 F.3d 1353, 52 U.S.P.Q.2d 1294 (Fed. Cir. 1999). Thus, it should be understood that, "Obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination." *Carella v. Starlight Archery*, 804 F.2d 135, 231 U.S.P.Q. 644 (Fed. Cir. 1986).

In this light, the combination of the cited references is silent and does not even remotely suggest Applicants' claimed invention. Thus, the combination of *Wilbur* and *Reed* references fails to disclose, teach, suggest, or render obvious every recited feature of Applicants' claimed invention. Applicants therefore request reconsideration and withdrawal of the Examiner's 35 U.S.C. §103(a) rejection to Applicants' independent Claims 38 and 86 and all claims dependent thereon.

Conclusion

Based on all the foregoing, it is respectfully submitted that each of Applicants' remaining claims is in condition for allowance and favorable reconsideration is requested.

This response is timely filed pursuant to the provisions of 37 C.F.R. §1.8 and M.P.E.P. §512. If any additional charges are due, the Examiner is authorized to deduct such charges from Deposit Account No. 16-2480 in the name of The Procter & Gamble Company.

Respectfully submitted,

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